

### REMARKS

Reconsideration and allowance are respectfully requested in light of the above amendments and the following remarks.

Claims 1, 3, 10, 20, 29, and 42 have been amended for clarity and to expressly recite a previously implicit feature of the claims.

It is noted that claim 42 is not rejected based on any cited prior art. An indication of allowability of claim 42 is requested.

The prior art rejections are as follows:

(1) Claims 1-7, 9, 10, 15, and 20-37 were rejected, under 35 USC §102(b), as being anticipated by Chan et al. (US 6,005,942).

(2) Dependent claims 16, 17, 19, 38, 39, and 41 were rejected, under 35 USC §103(a), as being unpatentable over Chan in view of Davis et al. (US 6,105,008).

(3) Dependent claims 18 and 40 were rejected, under 35 USC §103(a), as being unpatentable over Chan in view of Brown et al. (US 5,455,863).

The Applicants respectfully traverse the rejections based on the following points.

Chan describes a method and system for downloading an application onto a smart card after the latter has been issued, wherein an application server can electronically forward the

application to the smart card over an appropriate network and via a card acceptance device (Chan abstract, col. 3, lines 16-21, col. 10, lines 17-26 and 46-49, and col. 17, lines 8-12). The card acceptance device is used as a host to the smart card and comprises: (1) a means for functionally connecting to the smart card interface and a network and (2) a means for functionally communicating over the network with the application server (col. 10, lines 46-49).

The card acceptance device (i.e., the local client) comprises a communications means for transmitting and receiving message packets over a network using a packet-based communications protocol and for transmitting and receiving APDUs through a PSD interface (col. 5, lines 27-30, and col. 10, lines 21-26). Therefore, the card acceptance device comprises a data processing means for receiving incoming messages from the remote application server using the communications means and for separating encapsulated APDUs from the incoming message packets, in case these incoming message packets include such APDUs. It also comprises a data processing means for encapsulating APDUs into outgoing message packets and routing the outgoing message packets to the application server through the communications means.

An application load and install option is performed via a set of appropriate APDU commands received by a card domain 308 (col. 6, lines 1-2). Ordinarily, card domain 308 processes APDUs for several functions, as described in column 6, lines 9-17. A forwarded application is loaded onto the smart card by the card domain 308 (col. 10, lines 23-26). An install file is provided by the application server, signed and encrypted. A verification step during loading of the application includes a communication between the smart card and the card acceptance device through APDU commands (col. 18, lines 49-54).

After successful completion of the verification step, the install file is transmitted to the smart card, by initiating an APDU install command (col. 18, line 66, through col. 19, line 4). This command is also in APDU format, but all these APDUs which are exchanged between the smart card and the card acceptance device are not those APDUs which are separated by the card acceptance device from incoming message packets from the application server.

From the above, it is apparent that Chan differs from claim 1 in that Chan's first client data processing means is not suitable for routing those APDUs which are separated from incoming message packets to the PSD through the PSD interface.

As described for instance in column 19, lines 25-30, or col. 20, lines 2-7, Chan's card acceptance device has to perform several processings on the application to be transferred to the smart card before transferring any APDU containing such application into the smart card. The APDUs that are transferred to the smart card by the card acceptance device are generated by the card acceptance device itself.

Furthermore, in column 12, lines 46-50, Chan describes that card domain 308 of the smart card "executes and responds to commands [from the issuer] that result in a transition in the card life cycle from one state to the next," but this does not mean that incoming APDUs from the smart card are directly encapsulated by the card acceptance device into message packets to be transferred to any remote server.

Therefore, Chan also differs from claim 1 in that Chan's second client data processing means are not suitable for encapsulating into outgoing message packets those APDUs which are received from the PSD through the PSD interface.

Chan provides no description of how the card acceptance device transfers messages received from the smart card to a remote server. Therefore, there is no communications pipe generated between a PSD and a remote computer system over a network by directly encapsulating APDUs coming from the PSD

interface of a client into outgoing messages sent to the remote computer system over the network, and by directly routing, to the PSD interface, APDUs desencapsulated by the client from messages coming from the remote computer system over the network.

An object of the present invention as claimed in claim 1 is to overcome the problem of security within client terminals connected to a network, such as the Internet, by generating a communications pipe between a PSD and a secured remote computer system, which enables to relocate APDU interface and security mechanisms to the secured remote computer system.

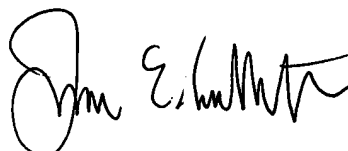
Accordingly, the Applicants submit that Chan does not anticipate the subject matter defined by claim 1. Independent claims 20 and 29 similarly recite the above-described features distinguishing apparatus claim 1 from Chan, but with respect to methods. For similar reasons that these features distinguish claim 1 from Chan, so too do they distinguish claims 20 and 29.

Davis et al. and Brown et al. were applied against dependent claims and do not cure the above-noted deficiencies of the primary Chan reference.

In view of the above, it is submitted that claims 1, 20, 29, and 42 and all claims dependent therefrom are allowable and that this application is in condition for allowance. A notice to that effect is respectfully solicited.

If any issues remain which may best be resolved through a telephone communication, the Examiner is requested to telephone the undersigned at the local Washington, D.C. telephone number listed below.

Respectfully submitted,



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